

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

KEVIN COOK and CABELL GOODMAN, §
PLAINTIFFS, §

CIVIL ACTION NO. 3:24-cv-00656-MHL

VERSUS §

ADVON CORPORATION, §
DEFENDANT. §

DISTRICT JUDGE M. HANNAH LAUCK

DECLARATION DEBORAH CARUTHERS

Pursuant to 28 U.S.C. § 1746, I hereby state the following is true and correct to the best of my knowledge.

1. My name is Deborah “Debbie” Caruthers and I am over the age of majority and competent to testify to the following based on my personal knowledge.
2. I am the Corporate Treasurer and Controller of Advon Corporation.
3. I have held this position from March 1, 2017 to the present.
4. I am 61 years old.
5. I have been diagnosed with a heart condition.
6. On June 18, 2025, I had surgery because of this physical condition.
7. Due to my physical condition, my ability to travel long distances and particularly by airplane, is extremely limited.
8. I have never visited Richmond, Virginia for business related reasons or for personal reasons.

I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Executed on this 24th day of June 2025.


Deborah “Debbie” Caruthers